

Anna Aurilio <asquared@pirg.org> on 10/26/99 04:05:44 PM

EIS000159

To:

EISR/YM/RWDOE

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cc:

OCT 26 1999

Subject: comment on DEIS

I've attached my comments as a Word for Windows file.



- nukewastedeis.doc

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TESTIMONY OF ANNA AURILIO STAFF SCIENTIST U.S. PUBLIC INTEREST RESEARCH GROUP

ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN, NYE COUNTY, NEVADA

INTRODUCTION:

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Nuclear waste is the deadliest substance known to humans. A few seconds exposure to an irradiated fuel rod causes cancer, a few minutes, death.

Common sense dictates that we treat this material with utmost caution to protect human health and the environment. Any decision regarding this radioactive waste must be based on sound science and protecting the public. Instead, nuclear waste policy in this country has been driven by the arrogance and greed of the nuclear industry and the reckless legislation promoted by industry allies. Political expediency has replaced responsible stewardship, as sound science and decision-making is thrown out the window at the request of the nuclear industry.

We are disappointed that the Department of Energy (DOE) has chosen to continue this trend as evidenced in its continued refusal to follow its own guidelines and disqualify Yucca Mountain while simultaneously seeking to weaken the guidelines, and in this draft EIS. This draft EIS is an expensive rubber stamp for the Yucca Mountain waste dump. It is not the careful, conservative analysis of safety and environmental issues required of a public agency.

THE PREMISE OF THIS DRAFT EIS IS FLAWED

While the concept of building a nuclear waste dump that is destined to leak is preposterous, this draft EIS is premature since it does not analyze the actual design. The only two other options examined in this draft EIS are unrealistic and thus do not provide for reasonable comparisons.

THE DRAFT EIS DOWNPLAYS OR IGNORES IMPORTANT AND RELEVANT SCIENTIFIC DATA

In its rush to win approval of the Yucca Mountain dump, DOE downplays or ignores important data about rainwater and groundwater flow and contaminant transport. For example, DOE claims that the data on Chlorine 36 are "incomplete" yet a study on this issue was published in September, 1997.

THE DRAFT EIS DOES NOT ANALYZE SPECIFIC TRANSPORT ROUTES

This draft EIS does not consider actual or likely transport routes. This means that it can draw broad conclusions about overall health threats or disproportionate impacts on low income or minority communities with no actual data for comparison.

5 THE TRANSPORT ACCIDENT ANALYSIS IS UNCLEAR

It is impossible to assess the draft EIS basis for impacts of transportation accidents based on the vague descriptions in the reports and appendices.

CONCLUSION

DOE currently spends billions of dollars every year in an effort to protect the public from radioactive wastes dumped as a result of weapons production. The technical difficulties in doing this are nearly insurmountable and in some places, millions of dollars are being spent merely in monitoring the spread of the radiation. With 95% of the radioactivity in this country coming from commercial waste, DOE should reject the Yucca Mountain site and work to develop and implement nuclear waste policies based on sound science and protecting the public health instead of the nuclear industry's profits.

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